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Counsel for Defendant BUILD OUR CENTER

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY; WASHOE COUNTY
LIBRARY SYSTEM; JEFF SCOTT; THANH
NGUYEN; JAMIE HEMINGWAY; BEATE
WEINERT; STACY MCKENZIE; JONNICA
BOWEN; BEN WEST; BUILD OUR
CENTER, INC.; STACEY SPAIN;
ANGELINE PETERSON; CHRISTOPHER
DANIELS; DEPUTIES ROTHKIN, SAPIDA,
GOMEZ; KRISTEN RYAN, JENNIFER
COLE; and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT
BUILD OUR CENTER'S
RESPONSE TO PLAINTIFF DREW
RIBAR'S SUPPLEMENTAL
OPPOSITION TO DEFENDANT
BUILD OUR CENTER'S ERRATA
RE MOTION FOR CASE
MANAGEMENT CONFERENCE,
RESTRAINING ORDER, AND
SANCTIONS**

Defendant BUILD OUR CENTER INC., by and through its undersigned counsel, respectfully files *Defendant Build Our Center's Response to Plaintiff Drew Ribar's Supplemental Opposition to Defendant Build Our Center's Errata Re Motion for Case Management Conference, Restraining Order and Sanctions*.

This *Response* is made and based upon all records and pleadings on file herein, together with every exhibit attached hereto (each of which is incorporated herein by reference), as well as the points and authorities set forth directly below.

In support of this Response, BOC states as follows:

MEMORANDUM OF POINTS AND AUTHORITIES

To the extent a response is necessary to *Plaintiff's Supplemental Opposition to Defendant Build Our Center's Errata re Motion for Case Management Conference, Restraining Order, and Sanctions* ("Supplemental Opposition") [ECF

1 137], BOC responds as follows: BOC filed an Errata on September 22, 2025 [ECF
2 133] solely to correct typographical errors in its Motion [ECF 130]. Filing an
3 errata to clarify minor mistakes is standard practice and was not, as Mr. Ribar
4 alleges, a nefarious attempt to “back-door amend” BOC’s Motion. The corrections
5 merely clarify the record and introduce no new factual or legal arguments. As
6 such, the Court should disregard Mr. Ribar’s Supplemental Opposition and
7 consider the filing as more documentation of Mr. Ribar’s continued vexatious
8 litigation. Further, Mr. Ribar is precluded from filing a supplement without leave
9 of court. LR 7-29(g). “A party may not file supplemental pleadings, briefs,
10 authorities, or evidence without leave of court granted for good cause. The judge
11 may strike supplemental filings made without leave of court.” *Id.*

12 DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

13 /s/ Alison R. Kertis, Esq.

14 By: _____

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CERTIFICATE OF SERVICE

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

Drew Ribar

480 Pershing Lane, Washoe Valley, NV 89704
(775) 223-7899
const2audit@gmail.com
Plaintiff in propria persona

Lindsay L. Liddell (SBN 14079)

Andrew Cobi Burnett (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

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Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy McKenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez

DATED: September 30, 2025.

/s/ Monica R. Leazer

an employee of the
SIERRA CREST BUSINESS LAW GROUP

INDEX OF EXHIBITS

to

DEFENDANT BUILD OUR CENTER'S RESPONSE TO
 PLAINTIFF DREW RIBAR'S SUPPLEMENTAL OPPOSITION TO
 DEFENDANT BUILD OUR CENTER'S ERRATA RE MOTION FOR CASE
 MANAGEMENT CONFERENCE, RESTRAINING ORDER, AND SANCTIONS

re

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
	None,	
	Not applicable.	